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Other rules, however, have been adopted in other jurisdictions. For instance, the cost of re-seeding the meadow, and its rental value until it is restored to its former condition have been allowed. *Railway Co. v. Jones*, 59 Ark. 105, 26 S. W. 595; *The P., C. & St. L. Ry. Co. v. Hixon*, 110 Ind. 225, 11 N. E. 285. The market value of the crop when matured, less the cost of producing, harvesting, and marketing, has sometimes been recovered. *Smith v. Railroad Co.*, 38 Iowa 518; *Shotwell v. Dodge*, 8 Wash. 337, 36 Pac. 254. In addition to the value of the crop destroyed, plaintiff has been permitted to receive (1) the cost of restoring the meadow to its former condition, *Bradley v. Iowa Central Ry. Co.*, 111 Iowa 562, 82 N. W. 996; (2) compensation for services in preventing further injury, *Mo. Pac. Ry. Co. v. Ricketts*, 45 Kan. 617, 26 Pac. 50; (3) interest on the value from the time of destruction until verdict, *Clark v. Bank*, 6 Houst. (Del.) 584; *Lampley v. Atlantic Coast Line R. R. Co.*, 63 S. C. 462, 41 S. E. 517. In case of a permanent injury to the land the difference in value of the premises before and after the fire may be recovered. *Wiggins v. Railroad*, 119 Mo. App. 492, 95 S. W. 311; *F. W. & N. O. Ry. Co. v. Wallace*, 74 Tex. 581, 12 S. W. 227. But in the principal case plaintiff could get nothing for injuries to the inheritance because he was only lessee and therefore had no interest in it.

EVIDENCE—ADMISSIBILITY OF A DEED AS AN ANCIENT DOCUMENT.—Defendant offered in evidence a deed, as an ancient instrument. It was shown to be more than thirty years old and one of a kind which the law required to be kept in the public archives. But it was found among the papers of one of the grantees in possession of his daughter. Held, that this deed could be admitted as an ancient instrument. *Frugia et al. v. Trueheart et al.* (1908), — Tex. Civ. App. —, 106 S. W. Rep. 736.

One of the requirements in order that such an instrument can be admitted without proof of execution, is that it be found in a proper custody. *Whitman v. Heneberry*, 73 Ill. 109; *Whitman v. Shaw*, 166 Mass. 451. But a proper custody need not be the usual one, as was said in *Croughton v. Blake and others*, 12 M. & W. 205. In order to render a written document admissible it is not necessary to show that it has come from the most proper custody. *Bishop of Meath v. Winchester*, 3 Bing. N. C. 183. It is sufficient if it comes from a place where it might reasonably be expected to be found. What is proper custody is a question for the court. *Rees v. Walters*, 3 M. & W. 527.

EVIDENCE—ADMISSIONS IN PLEADING.—Defendant offered as an admission the reply of the plaintiff, which had later been amended by cutting out the allegation containing the admission. Held, the part removed from the pleading by the amendment is out of the case and cannot be treated as an admission of the party pleading it. *Kersten v. Weichman et al.* (1908), — Wis. —, 114 N. W. Rep. 499.

The decision can hardly be reconciled with the former Wisconsin case of *Norris v. Cargill*, 57 Wis. 251. It is in harmony with *Smith v. Davidson*, 41 Fed. 172; *Holland v. Rogers*, 33 Ark. 251; *Mecham v. McKay*, 37 Cal. 154;